

Committee Management Associates

Michael deSilva
Director

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Oct 27 12 23 PM '98
October 23, 1998

Mr. Scott Francis
Reports Analysis
Federal Election Commission
Washington, DC 20463

Dear Mr. Francis:

I am writing in response to your letters of September 16 in which you sought clarifying information for a number of expenditures by the American Council of Life Insurance PAC. Our FEC identification number is C00147066. We also received John Gibson's follow up letter of October 8.

Let me first apologize for the delay in our response. The number of questions you posed demanded a great amount of time to be resolved.

First, you pointed out that we had apparently exceeded the \$15000 limit which a PAC may contribute to a national party organization with our July 9, 1998 check of \$15000 to the National Republican Campaign Committee coming on top of an earlier, May 13, 1998 check of \$1000. This was indeed a mistake and we have requested a refund of \$1000 from the NRCC.

Next you pointed out that our contributions to Steven LaTourette (R-19-OH) and Paul Gillmor (R-5-OH) were made after the primary but were attributed in our reports to the primary. We have verified that neither candidate carried a primary debt and have therefore reattributed these contributions to the correct race, the general election. Attached is a Schedule B reflecting these corrections.

Our check #4770 of 3/26/98 in the amount of \$3500 and payable to Richard Baker for Congress (R-6-LA) was voided.

Our check for \$1000, payable to Bond for Senate (R-MO), dated September 30, 1994, carried no marked attribution. Sen. Bond's campaign thus correctly attributed it to the next election, the 1998 primary. It was incorrectly attributed in our original Schedule B to the general election. We have corrected this attribution on the attached revised Schedule B. Thus Life Insurance PAC has contributed \$5000 to Sen. Bond's primary campaign and another \$5000 to the general election campaign.

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I have attached a one page spreadsheet showing the dates and correct attributions of our contributions to Senator D'Amato (R-NY). The spreadsheet shows that Life Insurance PAC has contributed \$5000 to each of the primary and general election campaigns.

Our expenditure of March 26, 1998, reported as having been made to the New Republican Majority Fund, was actually made to a different committee with a similar name, the Republican Majority Fund. I have attached a Schedule B reflecting the correct name of the committee and its address.

We will report the refund from the NRCC when we receive it. The voided check to Congressman Baker will be reported on our next filing, due at the end of next month.

I believe this resolves all outstanding questions you have posed about our receipts and expenditures. We appreciate the close attention you give our reports and will continue to try to make our reports as accurate as possible.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael deBlois", written over the word "Sincerely,".

Michael deBlois

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Life Insurance PAC

Name	Purpose	Date	Amount
Paul Gillmor	Contribution	06/09/98	500.
Citizens for Gillmor	R 5 OH		
PO Box 910	Aggregate: 500.		
Port Clinton ,OH 43452	Election: G		

Name	Purpose	Date	Amount
Steve LaTourette	Contribution	05/11/98	500.
Latourette for Congress	R 19 OH		
1004 Millridge Rd	Aggregate: 500.		
Highland Hghts ,OH 44143	Election: G		

Total this period 1000.

Life Insurance PAC

Name	Purpose	Date	Amount
Richard Baker	Contribution	03/26/98	0.
Baker for Congress	R 6 LA		
9132 Highland Garden Rd.	Aggregate: 1000.		
Baton Rouge, LA 70811	Election: P		
	Total this period		0.

Life Insurance PAC

Name	Purpose	Date	Amount
Kit Bond	contribution	09/30/94	1000.
Missourians for Kit Bond	R MO		
293 Russell	Aggregate: 1000.		
Washington, DC 20510	Election: P		
	Total this period		1000.

Life Insurance PAC Contributions to Sen. D'Amato 1994-98

Date	Primary	General
5/18/94	2000	
2/2/95		2000
11/3/95	1000	
11/29/95		2000
4/10/97	void	
6/1/98		1000
6/1/98	2000	
Total	5000	5000

Life Insurance PAC

Name	Purpose	Date	Amount
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Republican Majority Fund	Contribution	03/26/98	5000.
PO Box 19897	R DC		
Alexandria ,VA 22320-5737	Aggregate: 5000.		
	Election:		
	Total this period		5000.

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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